

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent,
and next friend “SUSAN;” and “MATTHEW,”
by guardian, parent, and next friend “MARK;”
on behalf of themselves and all those similarly
situated,

Plaintiffs,

v.

DONALD J. TRUMP, President of the United
States, in his official capacity, et al.,

Defendants.

Case No. 1:25-cv-244

**DECLARATION OF ADRIANA LAFAILLE IN SUPPORT OF
PLAINTIFFS’ MOTION FOR CLASS CERTIFICATION**

I, Adriana Lafaille, declare as follows:

1. I am a Managing Attorney at the American Civil Liberties Union Foundation of Massachusetts, Inc., and am counsel for Plaintiffs in the above-captioned matter. I make this declaration to describe my qualifications to serve as counsel for the Proposed Class in this case. The following facts are based on my own personal knowledge and, if called as a witness, I could and would testify competently thereto.

2. I have litigated cases relating to the rights of noncitizens since 2013. I graduated from Harvard Law School in 2010 and clerked for the Honorable Ralph D. Gants of the Supreme Judicial Court of Massachusetts, and then for the Honorable Mark L. Wolf of the United States District Court for the District of Massachusetts. I am admitted to practice in Massachusetts and New York and am admitted to the bars of the United States District Court for the District of Massachusetts and the United States Court of Appeals for the First Circuit.

3. I specialize in federal litigation on issues relating to noncitizens, including the rights

of noncitizens under the U.S. Constitution and the Immigration and Nationality Act. My cases in this area include: *Gordon v. Napolitano*, D. Mass. 3:13-cv-30146-PBS (involving application of certain immigration detention provisions); *Calderon v. Nielsen*, D. Mass. 1:18-cv-10225-MLW (involving the rights of U.S. citizens and their noncitizen spouses); *Pereira Brito v. Barr*, D. Mass. 1:19-cv-11314-PBS (involving constitutional rights of detained noncitizens); *Bollat v. Mayorkas*; D. Mass. 1:20-cv-10566-IT (involving noncitizens expelled from the United States under “Migrant Protection Protocols”); and *Greater Boston Legal Services v. Department of Homeland Security*, 1:21-cv-10083-DJC (involving policy of not disclosing documents to noncitizens and their counsel).

4. I was class counsel in three of these cases, *Gordon v. Napolitano*, *Calderon v. Nielsen*, and *Pereira Brito v. Barr*.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Adriana Lafaille
Adriana Lafaille

Executed on March 14, 2025.